

From: [Mark Simms](#)
To: [Bob Padmore](#); [Nicole DuBois](#); [Justin Vondrak](#); [Joe Fontenot](#); [Craig Samek](#)
Cc: [Tom](#); [Marshall, Paul](#)
Subject: BOE digester waste, closing issue
Date: Friday, April 26, 2019 4:58:23 PM

All:

As a follow up to our calls late this afternoon regarding BOE and the digester decommissioning work that has apparently begun....

- I spoke to Tom Roos, Senior Environmental Specialist at DNR FO#3 regarding my understanding of what has transpired and the request for Sioux City to accept the lower 9 feet (volume not indicated) of solids and debris in the digester.
 - I need to know what BOE did with the contents of the digester that they have removed so far. I have no communication from them (have not asked staff yet if they have received any requests or communications) that BOE wanted or needed to discharge this waste, so am hopeful that it was NOT discharged to Sioux City's POTW. If it was, it was NOT authorized. Justin, do you have any information about how they disposed of the digester contents that have been removed so far?
 - I have called Joe Fontenot, WWTP Supt and asked that he immediately put plant staff on alert to watch for any unusual waste entering the plant. Joe- please also have someone check the point of entry of the SSC waste in the Floyd Monument field a couple of times. I can only assume that if the digester contents were discharged into the sewer system that it would have already impacted our wwtp so these checks may not reveal any new information. Operators would have raised concerns. Perhaps this waste was taken somewhere else? But we still need to be watching and prepared to grab samples.
 - Tom agrees that we have full authority to deny the request to take the waste. Based on the limited information we have we must not accept it. If we choose to consider taking it, the previous email that I sent to Justin outlines what needs to happen before we would allow it. We also need to control how it is received and at what volume and frequency.
- My understanding of the discharge request is that BOE is considering diluting the waste with flows from other industrial sources so it can be pumped more easily. The industrial sources that I am aware of may not be fully pretreating their discharge prior to sending it to BOE, so we may see an excess amount of FOG, TKN, BOD, TSS, or other if they use that waste to dilute the sludge in the digester. I think BOE's permit PROHIBITS diluting waste before discharge, so a special waiver would have been needed prior to such activity. I am not sure that waivers are legal.
- If SSC is preparing to operate and maintain the facility they need to communicate their intent asap. I would expect that they would need to make application for a permit and do so well in advance of any future discharge. I do not think we would transfer the BOE permit and would fully expect that if we issue a new permit to someone for this facility that it would have limits that would require some additional pretreatment.
- I do not have confidence that our primary treatment processes have the capability right now to properly handle the waste that could come from this source and feel that NPDES permit violations would likely result. If we were to take it, it would seem that the only acceptable

way is to have it trucked in and directly injected into our digesters. I'm not comfortable with that until we have more information.

- Waste that is still going to BOE which may be diverted to SC (BPI, Richardson)- we need some communication if either facility needs to use their emergency discharge permit and when that needs develops. We do not have any other permits IUs that are in operation in SSC.
- Need to know what actions SSC has taken and will take asap if they involve our POTW.

Tom is copied here in the event that I have misstated any part of our conversation. Due to the significance of this I above also chosen to copy Paul Marshall of EPA.

Joe- Tom is on call this weekend, if you see anything unusual please contact him on his cell phone and document it via email Please call me asap.

Thank you,

Mark Simms
Utilities Director
City of Sioux City
e: msimms@sioux-city.org
Office: [712.279.6957](tel:712.279.6957)